

1 Josh A. Cohen (SBN 217853)
2 CLARENCE DYER & COHEN LLP
3 899 Ellis St.
4 San Francisco, CA 94109
5 Tel: (415) 749-1800
6 Fax: (415) 749-1694
7 jcohen@clarencedyer.com

8 Attorney for Defendant
9 JOSEPH CAROZZA

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 JOSEPH CAROZZA,

17 Defendant.

CASE NO. CR-10-0642 CRB (BZ)

**STIPULATION AND ~~PROPOSED~~
ORDER MODIFYING CONDITIONS OF
RELEASE TO PERMIT
INTERNATIONAL TRAVEL FROM
FEBRUARY 19, 2012 THROUGH
FEBRUARY 25, 2012**

18 **STIPULATION**

19 Defendant Joseph Carozza has been on pretrial release since his initial appearance before
20 the magistrate court on September 23, 2010. As a condition of his release, Dr. Carozza was
21 required to surrender his passport to the Clerk of the Court. A further condition is that Dr.
22 Carozza not travel outside the United States without the permission of the Court.

23 Dr. Carozza now wishes to take a short business trip to the Bahamas from February 19
24 through February 25, 2012. Neither Pretrial Services nor the government objects to the
25 modification of Dr. Carozza's release conditions to accommodate this trip.

26 Accordingly, the parties agree and stipulate that the conditions of release should be
27 modified to permit Dr. Carozza to travel from his home in New Jersey to the Bahamas from
28 February 19, 2012 through February 25, 2012. The parties further agree and stipulate that the

1 Clerk of the Court shall return Dr. Carozza's passport to Dr. Carozza's counsel forthwith; that
2 counsel shall forward the passport to Dr. Carozza for purposes of this trip only; and that Dr.
3 Carozza shall return the passport to his counsel to be re-lodged with the Clerk on or before March
4 2, 2012. The parties further agree and stipulate that Dr. Carozza shall provide Pretrial Services
5 with any and all requested information concerning the logistics of his travel.

6 IT IS SO STIPULATED.

7
8 DATED: February 6, 2012

/s/ Josh Cohen

JOSH COHEN

Attorney for JOSEPH CAROZZA

9
10
11 DATED: February 6, 2012

/s/ Kirstin Ault

KIRSTIN AULT

Assistant United States Attorney

12
13
14 **ORDER**

15 By stipulation of the parties, and for good cause shown, it is hereby ordered that defendant
16 Joseph Carozza's conditions of release shall be modified as follows: Dr. Carozza shall be
17 permitted to travel from his home in New Jersey to the Bahamas from February 19, 2012 through
18 February 25, 2012. The Clerk of the Court shall return Dr. Carozza's passport to Josh Cohen,
19 counsel for Dr. Carozza, upon Mr. Cohen's request; Mr. Cohen shall forward the passport to Dr.
20 Carozza for purposes of this trip only; and Dr. Carozza shall return the passport to Mr. Cohen
21 upon completion of the trip to be re-lodged with the Court on or before March 2, 2012. Dr.
22 Carozza shall provide Pretrial Services with any and all requested information concerning the
23 logistics of his travel. All other conditions of release shall remain in effect.

24 IT IS SO ORDERED.

25 DATED: 7 Feb, 2012

Bernard Zimmerman
BERNARD ZIMMERMAN

UNITED STATES MAGISTRATE JUDGE